

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

	X	
In re PAYMENT CARD INTERCHANGE	:	MDL No. 1720(MKB)(JAM)
FEE AND MERCHANT DISCOUNT	:	
ANTITRUST LITIGATION	:	Civil No. 05-5075(MKB)(JAM)
	:	
	:	RULE 23(b)(3) CLASS COUNSEL'S
This Document Relates To:	:	STATUS REPORT
	:	
ALL ACTIONS.	:	
	:	
	X	

Following submission of Rule 23(b)(3) Class Counsel's ("Class Counsel") monthly report regarding third parties, the Court ordered Class Counsel to provide a status report regarding several of the matters raised in the Report. March 7, 2025 text-entry Status Report Order ("March 7 Order"). Class Counsel provides the requested updates below.

## **I. JAM3STRO**

To date, Class Counsel has received no communication from the person believed to be responsible for the entity JAM3STRO other than a single communication reported to the Court in mid-February. Class Counsel has continued to serve via email all matters that mention this entity. Class Counsel has directed Epiq to determine the costs that were incurred by Epiq regarding this entity and has further directed Epiq to officially withdraw all the purported claims JAM3STRO sought to represent, following the expiration of the time to appeal the Court's *Sua Sponte* Report and Recommendation to the District Court. ECF 9572. Epiq reported that the issue related to JAM3STRO was quickly handled, and as such, the costs associated with this have been fairly minimal (under \$2,000).

Additionally, as reported in Class Counsel's March 11, 2025 letter to Court (ECF 9575), a detailed letter was sent with exhibits to the Fraud Section, Criminal Division of the United States Department of Justice ("DOJ"). No response from the DOJ has been received as of March 20, 2025.

## **II. LenCred**

Class Counsel contacted both Epiq and LenCred to inquire as to whether any additional issues have arisen since the March 7 Order. LenCred provided an email regarding one of the previously reported issues. That email appeared to clarify that although later withdrawn, the merchant no longer was alleging any misconduct as to LenCred. Epiq reported one complaint it had received related to communication between a merchant and LenCred, but subsequently reported the issue had been resolved.

### **III. Certificate Clearing Corporation**

Class Counsel contacted both Epiq and Certificate Clearing Corporation's ("CCC") counsel to inquire as to whether any additional issues have arisen since the March 7 Order. Epiq reported no additional issues. Class Counsel shared the last status report with the affected state agency. Counsel for the agency thanked counsel for the update. CCC's outside counsel reported he had no further updates. This matter appears to have been limited and resolved.

At this time, there are no other pending matters related to these entities that Class Counsel is aware of. The next monthly report will be filed April 11, 2025.

DATED: March 20, 2025

ROBBINS GELLER RUDMAN  
& DOWD LLP  
PATRICK J. COUGHLIN  
ALEXANDRA S. BERNAY

---

s/ Alexandra S. Bernay  
ALEXANDRA S. BERNAY

655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

ROBINS KAPLAN LLP  
K. CRAIG WILDFANG  
THOMAS J. UNDLIN  
RYAN W. MARTH  
2800 LaSalle Plaza  
800 LaSalle Avenue South  
Minneapolis, MN 55402-2015  
Telephone: 612/349-8500  
612/339-4181 (fax)

BERGER MONTAGUE PC  
H. LADDIE MONTAGUE, JR.  
MERRILL G. DAVIDOFF  
MICHAEL J. KANE  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
Telephone: 215/875-3000  
215/875-4604 (fax)

Co-Lead Counsel for Plaintiffs